

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 23, 1993

Mr. Tom Hudson
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 200
Seattle, WA. 98119-3958

Re: Notices of Violation #29969 and #29972

Dear Mr Hudson,

Your letter of March 18 requested a report from Ash Grove Cement Co. on corrective action taken or proposed to address two exceedances you observed at our plant.

Notice of Violation #29969

This notice of violation concerns an opacity violation you observed from our main stack on March 9, 1993.

As PSAPCA knows, Ash Grove Cement Co. has been experimenting for months to find the most effective means of preventing visible emissions when the Loesche mill is not running. We have been working to keep you posted on our progress and we will continue to do so. It is our intent to provide you with the information that has been obtained from all tests conducted at our scheduled April 16, 1993 meeting.

To date, two means of control, water sprays and chemical additives, have been tried and are currently being evaluated for their effectiveness. Water sprays were installed in the down comer duct on the preheater tower to cool and condense the gas stream ahead of the baghouse. Three chemical additives have been used separately by introducing them at various points into the process to react with the sulfur dioxide. The additives tested were Sodium Bicarbonate, Calcium Hydroxide and Caustic Soda.

Two other chemical additives that have been identified and will be tested for their effectiveness in the very near future.

As indicated in my March 9 report, we are employing these methods as necessary and continue to evaluate their effect on the emission.

AGCS2M001036

Notice of Violation #29972

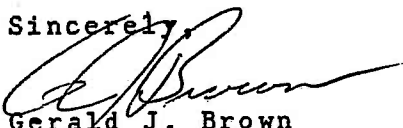
The malfunction which allowed masonry cement to be emitted to the air was not due to a failure to operate or maintain equipment in good working order but rather to previously unknown electrical condition which required both the high level indicator and the distribution screw to be in a stopped mode before an alarm condition was indicated. There was no symptom of any malfunction in this system.

This electrical condition was discovered as a result of this incident and corrected to permit an alarm condition for either a high level or zero screw speed when indicated.

To prevent similar events, all high level indicators will be inspected for independent operation by March 31, 1993.

If you should have any further questions, please call me at (206) 623-5596.

Sincerely,



Gerald J. Brown
Manager, Safety and Environment

Copy: K. Rone
D. Peters
H. Steuch



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

March 18, 1993

Certified Mail No.: P762 670 727

Mr. Ken Rone
Ash Grove Cement
3801 E. Marginal Way S.
Seattle, Washington 98134

RECEIVED
11 MAR 19 1993
AGCW - SEATTLE

Dear Mr. Rone:

Notices of Violation No. 29969 and 29972 and Corrective Action

On February 25, 1993 and March 9, 1993 Ash Grove Cement facility located at 3801 E. Marginal Way conducted activities which constitute violations of Puget Sound Air Pollution Control Agency's Regulation I. A copy of these provisions are enclosed for your information.

The enclosed Notices of Violation are being issued for not maintaining the high level indicator in the steel scale tanks in good working order thereby allowing masonry cement to be emitted to the ambient air, and for causing or allowing an operation which produced an exhaust plume with greater than 20% opacity for a continuous period of greater than six minutes.

These emissions are of particular concern to us since your facility is located in an area known to be in violation of the National Ambient Air Quality Standard for particulate matter/carbon monoxide and ozone. Emission reductions are required for attainment of the standards which were federally mandated as of January 1, 1991.

*See pg. 2
PLS HANDLE*
Pursuant to Section 3.09 of Regulation I, you are required to submit a written report within ten (10) days of receipt of this letter describing the necessary corrective action you have taken or propose to take, including a schedule for implementation, in order to be in continuous compliance with PSAPCA Regulations.

While we are hopeful that your corrective action plans will be acceptable to us and promptly implemented, I do want to inform you that violations of PSAPCA Regulations may subject you to enforcement actions including, but not limited to, civil penalty assessments of up to \$10,300.00 per day per violation. In the case of a continuing violation, each day's continuance is considered a separate and distinct violation.

If you have any questions, please contact me at 689-4031. We look forward to receiving your response.

Sincerely,

Thomas J. Hudson
Air Pollution Inspector

TJH:am

Enclosures

Anita J. Frankel, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Tim Hill, King County Executive

Peter Hurley, Councilman, Snohomish County
Pete Kinch, Mayor, Everett
Louis Mentor, Mayor, Bremerton

Norm Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive
Karen Vialle, Mayor, Tacoma

AGCS2M001038

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. _____

Cert. Mail No. P 762 670 727

No. **29969**

NOTICE OF VIOLATION

Date of Violation: March 11th 1993 at 11:38 a.m.

Name <u>Ash Grove Cement</u>	Responsible Person, Title <u>Ken Rone, Jr. Plant Mgr.</u>		
Location of Violation (Address) <u>3801 E Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>Same</u>	City, State 	Zip 	Phone

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 3.05(b) Right of entry refused - inspection interference
- ☐ Section 5.03 Failure to register with the Agency as an air contaminant source.
- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03 Failure to obtain Notice of Construction approval prior to construction/installation/establishment of new contaminant source.
- ☐ Section 6.07(a) Failure to meet operation conditions of Order of Approval.
- ☒ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour
- ☐ Section 9.04 Particulate matter deposited on property in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.15(d) Fugitive dust emissions in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.

☐ Section _____

☐ Section _____

VIOLATION DESCRIPTION Visible emissions were recorded for 6 minutes with no reading less than 45% opacity

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Return call from Mr. Rone 11:40 am on line at 12:39pm R/J drove by source at 1:30 am
put lotion mill in operation as soon as possible

Issued By [Signature] Date/Time 3-9-93

Received By _____
 Signing this Notice is not an admission of guilt

On Behalf of [Signature]
 Air Pollution Control Officer

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

No. 29972

Registration No. _____

Cert. Mail No. P 762 670 727

NOTICE OF VIOLATION

Date of Violation: February 25, 1993 at 0700 hrs. m.

Name <u>Ash Grove Cement Co</u>		Responsible Person, Title <u>Ken Rone Jr Plt Mgr</u>	
Location of Violation (Address) <u>3801 E Marginal Way So</u>		City <u>Seattle</u>	Zip <u>98134</u>
Mailing Address <u>same</u>		City, State <u>Seattle</u>	County <u>King</u> Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 3.05(b) Right of entry refused - inspection interference
- ☐ Section 5.03 Failure to register with the Agency as an air contaminant source.
- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03 Failure to obtain Notice of Construction approval prior to construction/installation/establishment of new contaminant source.
- ☐ Section 6.07(a) Failure to meet operation conditions of Order of Approval.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour
- ☐ Section 9.04 Particulate matter deposited on property in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.15(d) Fugitive dust emissions in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☒ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☒ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Section _____
- ☐ Section _____

VIOLATION DESCRIPTION Masonry cement was emitted to the ambient air because of a malfunctioning high level indicator used during the transfer process (ref Ash Grove Ltr. dated 3-3-93)

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By [Signature]

3/18/93
Date/Time

Received By _____
Signing this Notice is not an admission of guilt

On Behalf of [Signature]
Air Pollution Control Officer

Form No. 70-119 (Revised 10-13-92)

AGCS2M001040